

ETEXT ATTACHMENT

04/14/2003 14 : 06

April 14, 2003

Mr. John D. Gibson
Assistant Staff Director
Reports Analysis Division
Federal Election Commission
999 E Street, NW
Washington DC, 20463

Re: UAmerican Council of Life Insurers PAC ("ACLI-PAC"), C00147066
Response to Request(s) for Additional Information

Dear Mr. Gibson:

This letter is in response to the FEC's Request for Additional Information dated December 11, 2002 ("RFAI") and the 2d Request for Additional Information dated January 30, 2003 ("2d RFAI") regarding ACLI-PAC's 12 Day Pre-General Report (10/1/02-10/16/02) ("2002 Pre-General Report").

ACLI PAC did not receive the RFAI. Upon receipt of the 2d RFAI on March 10, 2003, I immediately researched the reasons why we didn't receive the first one and why no response had been forwarded to you by the due date(s).

By way of explanation, during the past year, ACLI and ACLI -PAC have moved office locations and have also undergone a significant number of staffing changes. The relocation and staffing changes, unfortunately, led to an oversight concerning notification to the FEC of our change of address, change of custodian of records and other changes, which in turn, led to the delay or non-receipt of the RFAI / 2d RFAI regarding the 2002 Pre-General Report.

These changes (including the change of address, assistant treasurer and custodian of records) have now been filed of record on an amended Statement of Organization. The amended Statement of Organization was filed on March 20, 2003 and the address information is listed below for your reference:

We have been in the process of researching the information needed to respond to the questions posed in the RFAI. Generally, the response(s) is that each of the contributions referenced in the RFAI were in-kind contributions from ACLI-PAC to the committees identified in the 2002 Pre-General Report, rather than contributions from ACLI.

ACLI-PAC paid for room or other charges associated with a fundraising event benefiting the referenced committee(s). We are still seeking specific facts and documentation regarding each of the referenced in-kind contributions and an amended 2002 Pre-General Report will be filed as soon as all documentation can be obtained.

We can provide specific information for the in-kind contribution to the Coleman for Senate committee. The event at the ACLI offices was sponsored by Coleman for U. S. Senate. The amount of \$300.00 for the costs of the room in which the event was held was paid by ACLI-PAC to ACLI, not to the candidate committee. The amount should have been reported as an in-kind contribution from ACLI-PAC to the Coleman for U.S. Senate campaign committee, rather than as a contribution from ACLI to Coleman for U.S. Senate. An amended

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2002 Pre-General Report will be filed to reflect this change.

With respect to the Tiberi for Congress and Pryce Project inquiries, we are still researching and seeking documentation regarding each of these events. Further information and an amendment to the 2002 Pre-General Report will be filed upon completion of my research. In both instances, however, the disbursements were in-kind contributions to the respective committees, paid by ACLI-PAC for the costs of a room and/or catering associated with a fundraising event to benefit the named committees.

We will forward to your attention the additional information as soon as we have documentation needed to respond, as well as filing the amendment to the 2002 Pre-General Report with the correct information.

If there are any additional questions or concerns in the meanwhile, please direct them to my attention by calling (202) 624-2360, or, in my absence, to the attention of our PAC Administrator, Kate Smith, at (202) 624-2035.

Sincerely,

Joanne Daly
Assistant Treasurer